

Welcome

Introduction

Statistics

While I don't envy your task I greatly admire your diversity, ability and tenacity in demanding justice on this most difficult and historic process.

The challenge that you have been faced with is to seek balance between very different opinions and most importantly to KEEP THE TRUST AND INTEGRITY IN THE WORD ORGANIC lest it become a farce as in "Real" and "Natural".

From "The Green Book", condensed from the NOSB definition of ORGANIC, "Certification is a regulatory system of trust which allows customers to identify and reward operators who meet organic standards." With the publication of Michael Pollen's New York Times Article, "The Organic Industrial Complex", conventional, organic wisdom may swing towards the paradigm of little or no inputs and processing. This is a good thing if the opposite model creates the dreaded "ORGANIC TWINKIE", albeit I do have a daughter whom will be terribly disappointed. The truth, however, which you have been asked to find, is somewhere in between. The underlying goal is and should remain to follow the law and, as I stated before, KEEP THE TRUST AND INTEGRITY IN THE WORD ORGANIC.

Here then, for what they're worth, are some faunchings and postulations of the Organic Valley Certification Czar.

On amending the National List

Please clarify and simplify the process. We are well aware of the runaway train. We simply don't quite know how to deal with it. There has been talk about correcting the language in the OFPA and/or the Final Rule, so that only materials which chemically interact or are present in the final formulation need to be petitioned. This would be similar to current language which will allow class four inerts to be used without petition. This strategy would be helpful to focus the limited and precious resources on the core issues. I.E. what is in the foods. Further relief would come if and when the idea of reciprocity between the Processing and Handling list and the Livestock list bears fruit.

On Boiler additives

Don't be afraid to take your time to get this very difficult issue correct. There is a certified organic baby in that bathwater. If your findings uncover any actual product contamination then the decision to prohibit is obvious. However, in the absence of such evidence may I suggest that certification in the presence of boiler additives be decided on a case by case basis by the accredited certifying agency.

On Amino Acids and other Synthetics

In the past and again in the course of these meetings you will hear passionate testimony to support and oppose to the use of synthetic amino acids and vitamins in organic systems. The task, and again, I do not envy you, is to discern on one hand, whether or not production with alternative methods is in fact practical and economically feasible and on the other hand if by permitting certain synthetic inputs a) you possibly go against the law as defined in OFPA, and/or b) you stymie the creative forces of innovation.

On secondary standards such as Fiber, Aquaculture, Greenhouse and Health and Beauty Aids.

As an impartial observer, much like Jimmy Carter, it has been a pleasure to watch this process unfold. The aquaculture standards have come a long way toward being credible, respectable and workable. If the word Organic is to remain a term of integrity you must put the same teeth in these secondary standards as OFPA mandates you to put into the Production and Handling rules.

On "Made with Organic Ingredients"

Please do not relegate functional foods to this category. If an item is 95% or greater organic and if the added "functional" component is on the National List the end product should be called ORGANIC. To do otherwise will only serve to further glaze the eyes of consumers and subsequently erode the integrity of the term Organic.

In closing let me leave you with the idea of promoting local control as an avenue to stricter and more uniform controls. Inspectors will have to answer to Accredited Certifiers who will, in turn, be accountable to the USDA. It will be in the Certifiers very best interest to point out inconsistencies and push each other's bar higher in order to KEEP THE TRUST AND INTEGRITY IN THE WORD ORGANIC.